



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Ocean Peace Inc., Seattle, WA

FROM: Daniel Heins, Environmental Scientist
AECAB (IL/IN)

THRU: Nathan Frank, Section Supervisor
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Ocean Peace, Inc.

Facility Location: 4201 21st Avenue West, Seattle, WA 98199

Date of Inspection: 8/31/2022

EPA Inspector(s):

1. Daniel Heins, Environmental Scientist

Other Attendees:

1. Phil Dang, Director of Safety & Compliance – Ocean Peace Inc.

Contact Email Address: pdang@oceanpeaceinc.com

Purpose of Inspection: Ozone depleting substances/refrigerants compliance inspection

Facility Type: Seafood company

Regulations Central to Inspection: 40 CFR Part 82 Subpart F

Arrival Time: 13:30

Departure Time: 14:00

Inspection Type:

- ☒ Unannounced Inspection

☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet (via email)
- ☐ Small Business Resource Information Sheet not provided.
- ☒ Provided CBI warning to facility

The following information was obtained verbally or via email from Phil Dang unless otherwise noted.

Process Description:

Ships for Ocean Peace Inc. (Ocean Peace) catch, process, and freeze fish all at sea. The fleet operates off the coast of Alaska. Ships typically are at sea from mid-winter through the fall, coming into Seattle for maintenance and repair in the fall and early winter. Ocean Peace does not own or operate any onshore seafood processing or storage facilities.

The Ocean Peace fleet has six ships, two of which (F/V Green Hope and F/V Bering Hope) are catcher vessels without freezer units. These ships deliver their catch to the factory trawlers to be processed and frozen. Two of the factory trawlers ships use R-22 (“freon”), and two use ammonia.

See the following table for a summary of the Ocean Peace fleet’s refrigeration units:

Ship	Refrigerant Type	Full Charge Pounds of Freon
F/T Ocean Peace	R-22	>500
F/T Alaska Warrior	R-22	>500
F/T Seafisher	Ammonia	N/A (Ammonia)
F/T Alaska Victory	Ammonia	N/A (Ammonia)

Staff Interview:

Members of the ship crews perform quarterly leak checks on the refrigeration units. The company has a list of staff that are certified to do these checks.

Ocean Peace has contracted refrigerant addition and unit maintenance to Technotherm and Highland Refrigeration when the ships are in port in the fall/winter in Seattle.

Phil Dang stated that the engineers on the ships are responsible for the details of compliance with the refrigeration requirements and that they maintain the records, and so he would pass on any of EPA’s questions and document requests to them to respond to.

TOUR INFORMATION

EPA Tour of the Facility: No

All Ocean Peace factory trawlers were at sea or docked in Alaska at the time of the inspection.

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

Phil Dang provided via email the 2021 National Pollutant Discharge Elimination System (NPDES) reports for the Ocean Peace and the Alaska Warrior.

According to its NPDES report, the Ocean Peace leaked 2,000 pounds of R-22 to the atmosphere in 2021, due to leaks, o-ring blowouts, and a recovery bottle leaking out a relief valve.

According to its NPDES report, The Alaska Warrior leaked 1,015 pounds of R-22 to the atmosphere in 2021, due to leaks.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Daniel Heins informed Phil Dang that EPA was looking into potential rule-writing for appliances using HFCs, pursuant to the AIM Act. Via email, Daniel Heins provided a link to the applicable refrigerant appliance maintenance and leak repair requirements under Part 82 Subpart F.

Requested documents:

- Full refrigerant charge values for units using freon
- Last 12 months (or otherwise most recent) leak check / repair reports for each unit/ship containing freon with technician certifications
- Last two years reports of leak rate calculations and in-dock refrigeration unit repair reports for each unit/ship containing freon
- Last two years of annual calibration reports for the automatic leak detection systems for each applicable unit/ship containing freon, if applicable

DIGITAL SIGNATURES

Report Author: _____

Section Supervisor: _____